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December 15, 2023

**DELIVERY METHOD: CM/ECF**

Hon. Lorna G. Schofield  
United States District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *Huckabee v. Meta, et al.***  
**Case No. Case No. 1:23-cv-09152 (S.D.N.Y.)**  
**Letter Concerning the Court's December 6, 2023 Order**  
**(ECF No. 53)**

Dear Judge Schofield:

We write on behalf of all Plaintiffs (Mike Huckabee, Relevate Group, David Kinnaman, Tsh Oxenreider, Lysa Terkeurst, and John Blase), to alert the Court that Counsel for the Plaintiffs have met and conferred with Counsel for the Defendants, and have reached tentative agreements on the following:

1. Plaintiffs will agree to dismiss EleutherAI without prejudice;
2. Plaintiffs will agree to sever and transfer their claims against Meta and Microsoft to the Northern District of California; and
3. Although “[t]he Court typically does not stay discovery while motions are pending,” Plaintiffs do not oppose the Bloomberg Defendants’ request to stay discovery (ECF No. 55).

The Parties will work together to file appropriate stipulations with this Court to finalize their agreements. We thank the Court for its attention to this matter and are available should the Court have any questions.

Sincerely,

The parties shall file proposed stipulations memorializing their  
agreements by December 22, 2023. So Ordered.

/s/ Amy Keller

Dated: December 18, 2023  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE